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17 **UNITED STATES DISTRICT COURT**

18 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

20 KHANH NIELSON, individually, and) **Case No. CV-11-4724 SBA**
21 on behalf of all others similarly)
21 situated,)
22 Plaintiffs,) **CLASS ACTION**
23 vs.)
23 **STIPULATION AND [PROPOSED] ORDER**
24 **THE SPORTS AUTHORITY,**)
24 and DOES 1 through 100, inclusive,)
25 **CONTINUING CLASS CERTIFICATION**
25 **BRIEFING SCHEDULE**
26 Defendants.)
26 **Judge: Hon. Sandra Brown Armstrong**

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ATTORNEYS AT LAW
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Plaintiff Khanh Nielson (“Plaintiff”) and Defendant TSA Stores, Inc. d/b/a Sports Authority (“Defendant”), by and through their respective counsel of record named herein, hereby stipulate as follows:

WHEREAS, prior to the February 22, 2012 Initial Case Management Conference, the parties agreed to attend private mediation;

WHEREAS, this Court set the following deadlines regarding class certification at the February 22, 2012 Initial Case Management Conference: Motion for Class Certification, September 21, 2012; Opposition to the Motion for Class Certification, October 19, 2012; Reply to Motion for Class Certification, November 7, 2012; and, the hearing on the Motion for Class Certification, December 11, 2012. (*see Dckt No. 18*);

1 **WHEREAS**, the earliest date by which mediation can be scheduled with the parties'
2 preferred mediator is July 2012;

3 **WHEREAS**, the parties have informally agreed to postpone resolution of outstanding
4 discovery disputes until immediately after the mediation session;

5 **WHEREAS**, should mediation prove unsuccessful, the parties will require the completion of
6 substantial written discovery and depositions in preparation for Plaintiff's Motion for Class
7 Certification:

8 **WHEREAS**, the parties will have insufficient time to complete such discovery, should
9 mediation fail, under the current briefing schedule;

WHEREAS, there have been no prior modifications to the class certification briefing schedule; and

2 **THEREFORE**, the parties, through their undersigned respective counsel, stipulate and
3 request that the Court hereby continue the class certification briefing schedule as follows:

IT IS SO STIPULATED.

Dated: April 2, 2012

SCOTT COLE & ASSOCIATES, APC

By: /s/ Hannah R. Salassi
Hannah R. Salassi, Esq.
Attorneys for the Representative Plaintiffs
and the Plaintiff Class

Dated: April 2, 2012

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

By: /s/ Erica K. Rocush
Erica K. Rocush, Esq.
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TSA STORES, INC

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ORDER

IT IS HEREBY ORDERED that:

The Class Certification briefing schedule is hereby continued as follows:

- Motion for Class Certification due: 1/29/13
 - Opposition to Motion for Class Certification due: 2/12/13
 - Reply to Opposition to Motion for Class Certification due: 2/19/13
 - Hearing on Motion: 3/19/13 at 1:00 p.m.

For good cause shown, PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 5-31-12

The Honorable Saundra Brown Armstrong
United States District Judge

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